Kirsten Johnson, MPH, CPH, CHES
Health Officer/Director

Guidance for Writing a COVID-19 Pandemic Operations Plan

Reopening During COVID-19:

The COVID-19 pandemic has greatly impacted our local, national, and global economies. As the economy begins to reopen in Washington and Ozaukee Counties, businesses and organizations should proactively create plans and policies to ensure the safety of their employees and the people they serve. The Washington Ozaukee Public Health Department wants businesses and organizations to be equipped with the tools and resources needed to safely reopen their doors. This document includes a collection of tools and resources to assist businesses/organizations in the creation of a modified business/organization COVID-19 pandemic operations plan.

Steps to writing an emergency business/organizational operations plan:

1. Include the voices of multiple stakeholders in the creation of the plan.
    a. Stakeholders may include: Human Resources, IT, Labor/Business Attorney, Business Managers, Sanitation Workers, Facilities Management, Other Administration
2. Review Key Considerations
3. Conduct a Risk Assessment

Contents

Key Considerations for Reopening During COVID-19 Pandemic	
Human Resources	- Who will be responsible for COVID-19 issues and how they impact our workplace(s)? - Are our human resources policies and processes consistent with public health recommendations and federal/state statutes? - Have we established a priority order of return? - Do new policies regarding sick leave, scheduling, control measures, etc. need to be established and/or continued? - How do we determine employee status and their availability to return? - Have employees been exposed to COVID-19? - How can we protect employees? - Can alternate work arrangements be established for at-risk employees? - Will there be new requirements for returning to work (e.g., employees must be symptom-free)? - How will hiring be conducted? - Have we accounted for a possible resurgence of COVID-19 within our workforce and the community? - Do we have a plan if stricter social distancing policies are enacted? - Can training be conducted virtually, including new hire and new health and safety requirements - What is the status of childcare and dependent care services to support employees returning to work?
Messaging & Communications	- How and what are we messaging/communicating with our employees, stakeholders, vendors, and customers? - What considerations need to be communicated to employees prior to reopening? - Health and safety measures? - Change in schedule or shifts? - Employee status? - Priority/phased opening? - Requirements for returning to work? - How frequently will messages be disseminated? - What should employees expect when they return to work? - How would we conduct employee accountability? - What should customers/stakeholders expect when we reopen? - Have we coordinated with contractors or vendors about their plans to reopen or how our reopening will impact them?
Facilities	- Who is responsible for ensuring our facilities meet the necessary safety and health guidelines to reopen? - Have we established a priority order for opening multiple facilities or business locations? - Have we identified the health and safety requirements outlined by CDC, HHS, OSHA, etc. specific to our organization? - Can our facilities accommodate any necessary social distancing requirements?

	• What health and safety assessments need to occur before we can re-enter our primary location? • Will this require contract or vendor support? • Can any necessary facility repairs, updates, or cleaning occur now (during social distancing measures) to prepare for reopening? • How can we reduce our employee exposure to COVID-19? • Have we created a plan to clean and disinfect our frequently touched objects and surfaces per EPA's criteria for use against COVID-19?
Resources & Logistics	• Have we determined which portions, if any, of applicable statutes apply to our organization (e.g. CARES Act, etc.)? • If required or necessary for infection control, do we have the necessary cleaning supplies and personal protective equipment (PPE) for our employees (e.g., masks, gloves, face shields, etc.)? • Has an accounting been done to determine what resources we have on hand, and what resources are required to reopen? • Is our supply chain able to accommodate supporting our logistical requirements in preparation for reopening?

Risk Assessment

One important step businesses/organizations can take to prepare for reopening is to conduct a risk assessment. Decisions driven by risk assessments will support protection of the health and safety of the public.

This risk assessment guidance comes from the Johns Hopkins' *Public Health Principles for a Phased Reopening During COVID-19: Guidance for Governors*. The report provides scores to individual sectors based on available published data and were determined by a group of public health and business experts. However, exact quantification of the risks of various activities is not possible. No mitigation step will reduce the risk completely, and even with multiple mitigation steps in place, some businesses or organizations may be too high a risk to open until a later date.

Every business/organization is encouraged to conduct a risk assessment specific to their trade and operational structure.

Risk Assessment Guide
- Assessing the risks requires a measurement of the *likelihood* of increased transmission and the *consequences* of that transmission.
- **Likelihood** – probability that reopening and organization where people will congregate will cause significantly increased transmissions.
- **Consequence** – impact that increased transmission could have on individuals or communities.

Risk can be assessed by categorizing business functions/operations into 3 categories:
- **Contact Intensity & Duration**

- o High Contact – activities involve prolonged close contact → sharing a dorm room
  - o Medium Contact – falls between high and low → sharing a meal in seats separated by several feet
  - o Low Contact – interactions that are brief and fairly distant → walking past someone in a shop
- **Number of Contacts** – approx. number of contacts is the approx. number of people in the setting at the same time (on average)
  - o Defined as Low, Medium, & High
  - o A higher number of contacts is presumed to be riskier
- **Modification Potential**
  - o A qualitative assessment of the degree to which activities can be modified to reduce risk
  - o Examples include: physical distancing modifications in workplaces, PPE, etc.

Special precautions should be taken to protect employees, potentially including restructuring duties to minimize person-to-person contact, changing work flows or operations to diminish risk, providing PPE for employees, and providing enhanced sanitation and hygiene supplies.

<u>Mitigation Strategies:</u>
Using the modified hierarchy of controls, COVID-19 mitigation measures can look like:
- Physical Distancing – wherever possible having people work or access the business from home; this should include restructuring responsibilities to minimize the numbers of workers that need to be physically present.
- Engineering Controls – creating physical barriers between people
- Administrative Controls – Redistributing responsibilities to reduce contact between individuals, using technology to facilitate communication
- PPE – having people were non-medical cloth masks
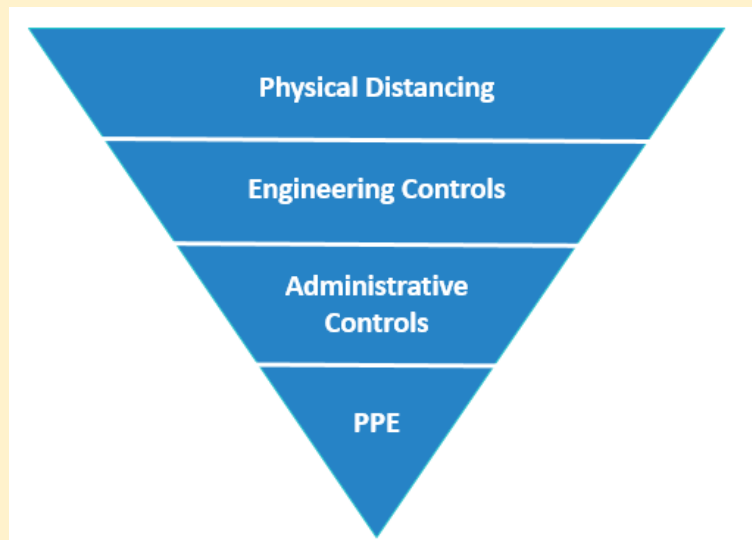
Additional Mitigation Strategies *(Morgan Lewis Law, 2020)*

Physical Workspace Modifications:
- Separating desks and work stations
- Modifying open floor plans by, for example, adding partitions
- Making only certain workstations available (i.e., every other or every other third workstation, or every other cubicle area)
- Closing or modifying common/conference rooms and break rooms/cafeterias
- Modifying high-touch surfaces, such as replacing latch-based doorknobs or handles with doors that can be easily pushed open or closed

- Displaying markings or signs reminding customers and employees:
    - To maintain social distancing in areas where people congregate
    - To avoid touching surfaces unnecessarily
    - To wash your hands properly and regularly
    - To wear a face covering where social distancing is not possible or unlikely to be effective
- Limiting in-person interactions and physical contact, potentially including:
    - holding fewer in-person meetings and using increased conference calls or video conferences;
    - limiting the size of in-person gatherings/social events (e.g., less than five people);
    - instructing employees not to use other employees' workspaces or equipment;
    - developing or revising a crowd control plan that changes security processes and procedures, such as setting a maximum number of employees and members of the public on company premises;
    - establishing ongoing restrictions regarding travel, including to client/customer meetings and events, or for meetings/conferences; and
    - setting staggered or spaced meal schedules.
- Training employees on social distancing policies and protocols, including where to go if there are questions or complaints, with the following factors in mind:
    - Management may need additional training to understand its responsibility for enforcing these policies at the local level
    - Individuals should be designated as responsible contacts for overseeing and ensuring implementation
    - Employers should consider how to track compliance and consistently discipline employees for failure to follow protocols.
- Updates to employee scheduling
    - Employers should consider ways of reducing the number of employees present at the workplace. Possible options include staggered shifts, alternating teams, and/or continued telework.
    - Predictive scheduling obligations under preexisting law will likely restart at some future date and employers should not rely on pre-pandemic schedules to meet future estimates of employee hours.

Employee Screening:
- Employers should discuss implementing regular **screening protocols** for employees, customers/clients, or other workplace visitors. Key considerations may include the following:
    - Whether to conduct screening or symptom checks and training personnel on how to appropriately conduct screening and maintain medical/private information collected through screening
    - Potential compensability of screening time
        - reviewing the screening location (i.e., on employer-specific premises or in a shared office location); and
        - potential complications of telling clients/customers not to enter company locations if they do not pass the screening.

Personal Protective Equipment (PPE):
- Employers should consider whether they will require **personal protective equipment** (PPE). Key considerations include the following:

- o Whether to make the wearing of masks mandatory, and if so, whether the employer will provide them or reimburse for them
- o Whether gloves are necessary for any areas/duties (i.e., taking/giving money to customers)
- o Whether additional PPE, if any, is required for employees in higher-risk positions.

Cleaning & Disinfection:
- **Cleaning and disinfecting** may require additional steps (including reviewing and renegotiating contracts with vendors that provide these services), such as:
  - o Extra cleaning and disinfecting, including attention to employee common use areas, and items handled by customers; and
  - o Making cleaning supplies/hand sanitizer available to employees (and customers/visitors).

Safety Communication Plan:
- Employers should develop a **safety communication plan** for returning employees that:
  - o Explains safety protocols (what measures the company is taking and what precautions employees should take), and where to report any issues
  - o References any benefits or perks the company is making available (plus a potential reminder about employee assistance programs); and
  - o Potentially establishes an employee safety committee to satisfy safety planning obligations in certain jurisdictions and provide a clear line of communication with employees.
  - o Note: These safety plans may take on particular importance given likely increase in OSHA investigations and issues as workplaces reopen in mass.

Telework:
- Employers should expect that for a wide variety of reasons, employees may request to continue teleworking even as workplaces reopen. Employers should consider impacts on management, communication, and staffing as certain operations are on site while other employees (or entire teams) continue to telework, perhaps permanently. Additionally, employers should ensure their HR teams are prepared to respond to requests for reasonable accommodations/flexible work arrangements that would have been denied before the COVID-19 pandemic.

Protocols for Tracking & Reporting COVID-19 Tests:
- Protocol should include identifying contacts and sharing information as appropriate with public health authorities, employees, and workplace guests and customers. Employers should take a consistent approach regarding requiring return to work and fitness-for-duty certifications and should monitor guidance from the Centers for Disease Control and Prevention and local public health authorities regarding reporting and contact tracing.

Comprehensive Review of Existing Policies:
Businesses have had to navigate mostly unchartered waters as they began to realize the breadth and effect of the COVID-19 pandemic. With the collective experience gained over the last several weeks, reopening the workplace should trigger a comprehensive review of policies/CBA provisions, especially in light of recent federal, state, and local legislation. Some factors to consider include:
- Leave
  - o Employers should consider how to address leave entitlements for employees' home and unable to work remotely as well as updates to policies going forward, including ensuring continued compliance with applicable and recently enacted sick leave laws.
  - o Employers may consider monitoring employees' personal/vacation travel as a safety measure.

- Furlough
  - Employers should consider how to bring employees back from furlough, including notification, phased rehiring, and potential new hires.
  - Although employers may take advantage of the current instability to target new hires for key positions, employers should be aware of new laws that require giving priority to furloughed or part-time employees and potential HR or union concerns if a company engages in aggressive outside hiring before bringing back furloughed workers.
- Benefits
  - Furloughed employees may need to reenroll or update benefit/commuter information and consider any impact on 401(k) programs.
  - Employees responsible for premium payments during furlough may be obligated to repay the amount the employer advanced for this purpose, but there are potential complications due to state deduction restrictions.
- Wage and Hour/Compensation plans
  - Employers should calculate the effect of shutdown periods on existing bonus/incentive plans.
  - Businesses should review wage and hour issues in light of such factors as continuous workday, reporting time and show up pay, and split shifts, etc.
  - Employers should review whether any pay equity issues exist and whether new hires can be used to offset that problem.

Other Practical Employer Issues:
- Reinstating security/IT access, reactivating credit cards, badges, etc.
- Ensuring recovery of any files or equipment/hardware employees took home to assist them in working remotely
- Reimbursing employees for business expenses

Pandemic Preparedness & Business Continuity:
In light of their COVID-19 experiences, companies should review and revise their current pandemic response plans in order to respond to another potential outbreak of the virus.
- These plans should address:
  - what lessons have been learned and what new processes and procedures should be put in place to prepare for a potential recurrence;
  - management and HR succession in the event any leadership team is sidelined;
  - updates to public relations messaging regarding crisis management issues and having a plan in place in the event of another outbreak in the workplace or other potential disruption, such as hurricanes, earthquakes, terrorist attacks, or new viral/bacterial outbreaks; and
  - whether to require vaccination once a vaccine is developed, including partial workforce vaccinations if vaccines are not widely available or cost-effective (and related ER issues).

COVID-19 BUSINESS/ORGANIZATIONAL OPERATIONS PLAN (TEMPLATE)

Note: *The following document does not contain an exhaustive list of mitigation strategies, and some items may not be applicable to your specific business/organizational requirements. Your plan should be written with as much detail as possible with feedback from your staff, board, legal team, etc.*

Physical Distancing:
- Before opening, perform immediate workflow audit that removes instances of employees and patrons being within 6' of each other.
- Ban in-person meetings (internal or external) and employee convenings (formal or informal) of any size. Employee communication handled virtually wherever possible.
- No client waiting room. Front doors will be locked. When client arrives for appointment they will be directed in from the front desk person via phone
- X number of clients/personnel will be allowed on the premises at one time
- Tape/markings will be placed on floor to indicate 6 feet of distance between patrons
- Physical barriers will be placed between check-out cashier and patrons
- Client services will be spaced a minimum of 6 feet apart (ex. Salon shampoo stations)
- Reduction of on-site work hours to minimum needed to sustain operations.
- Staggered shifts and work hours to minimize on-site human presence at a given time.
- Staggered use of all shared spaces, including bathrooms, breakrooms and lunchrooms
- Staggered facility entry and exit procedures.
- No deliveries except those that support production activities or emergency building maintenance.
- No visitors (including suppliers and customers) except those approved by senior management

Health Screening:
- Regular symptom screening performed and logged for all on-site employees
- Use WOPHD [COVID-19 Employer Screening Tool](#) for all who enter building
- Client screening via phone. Reschedule appointments for those who may be ill

PPE:
- All patrons and employees must wear a mask. If client does not have a mask, one will be provided for them OR they will not be permitted to enter.
- Direct Client Care: Stylist will wear both a mask and face shield as well as single use gloves.
- More

Cleaning and Disinfection:
- Blue tape marking of surfaces that receive frequent human contact; disinfection of these surfaces multiple times daily.
- Place hand sanitizer at each work station. Use disinfectant for each station to disinfect all areas before and after each appointment.
- Allocate extra time in between each appointment for proper disinfection of all surfaces and tools used.
- Sanitary processes implemented throughout facility (soap, hand sanitizer, single-use gloves, doors propped open, hands-free capabilities, no shared food).

- Front desk will disinfect every door handle and surfaces touched after every client visit
- More

Sick Leave:

- Employees must immediately report symptoms associated with COVID-19 exposure.
- Employees must report contact with any person who tests positive for COVID-19; employee must subsequently self-quarantine for 14 days and be symptom-free before returning to work.
- Employees that test positive for COVID-19 must be excluded from work for a minimum of 10 days and 72 hours since their last symptom.
- Employees may return to work after a confirmed negative COVID-19 test and 72 hours since their last symptom
- (INSERT INDIVIDUAL SICK-LEAVE POLICY, i.e., # of days, paid vs. unpaid, etc.)

Remote Work:

- Mandatory work at home for all employees except the absolute minimum required for baseline production and logistics functions.
- (insert other rules/regulations regarding remote work)

Travel Restrictions:

- International travel ban – business and personal.
- Domestic business travel bans except for critical operations (with senior management approval).
- Domestic personal travel requires employee to self-quarantine for 14 days and be symptom-free before returning to work.
- Any employee returning from a Level 2 or 3 CDC travel country must self-quarantine for 14 days and be symptom-free before returning to work.
- More

Additional Resources:

- [Reopening Guidance for Cleaning and Disinfection](#) (CDC)
- [WEDC COVID-19 Response Plan](#)
- [WEC Reopen Guidelines](#)
- [Planning Considerations for Organizations in Reconstituting Operations During the COVID-19 Pandemic](#) (FEMA)
- [Key issues to address before reopening after coronavirus (COVID-19) closure](#) (Waller Law)